

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ERICSSON INC. AND
TELEFONAKTIEBOLAGET LM ERICSSON,

Plaintiffs,

V.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,
AND SAMSUNG RESEARCH AMERICA,

Defendants.

Civil Action No. 2:20-CV-00380-JRG

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO MOVE, ANSWER OR
OTHERWISE RESPOND TO PLAINTIFFS' AMENDED COMPLAINT AND
WAIVER OF FOREIGN SERVICE REQUIREMENT**

Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Research America, Defendants herein, without waiving any defenses, move the Court to extend the time within which Defendants are required to move, answer or otherwise respond to Plaintiffs' Amended Complaint. In support of their Motion, Defendants state as follows:

1. On December 11, 2020, Plaintiffs filed their Complaint alleging patent infringement against Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Research America.

2. On December 15, 2020, Defendant Samsung Electronics America, Inc and Samsung Research America were served with Plaintiffs' Complaint. Samsung Electronics Company, Ltd. has not yet been served.

3. On January 1, 2020, Plaintiffs filed their Amended Complaint alleging patent infringement against Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Research America.

4. Counsel for Defendants have agreed to waive service under the Hague Convention for Samsung Electronics Company, Ltd., a foreign entity, in exchange for 60 days from January 1, 2020 for all Defendants to answer or otherwise plead by March 2, 2021.

5. Defendants' agreement with Plaintiffs should not be construed as a waiver of any other rights or defenses, including, for instance, Defendants' right to file counterclaims, affirmative defenses, or to otherwise challenge the validity of the subject patents.

WHEREFORE, Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Research America, respectfully request that the time in which they are required to move, answer or otherwise respond to Plaintiffs' Amended Complaint for Patent Infringement be extended up to and including March 2, 2021.

Dated: January 5, 2021

Respectfully submitted,

/s/ Melissa R. Smith

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***Attorney for Defendants
Samsung Electronics Co., Ltd.,
Samsung Electronics America, Inc.,
and Samsung Research America***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 5th day of January 2021.

/s/ Melissa R. Smith
Melissa R. Smith

CERTIFICATE OF CONFERENCE

I hereby certify that Defendants have met and conferred with Plaintiffs regarding this Motion via electronic mail on January 5, 2021. Plaintiff has indicated that it does not oppose this Motion.

/s/ Melissa R. Smith
Melissa R. Smith